

**PEMBROKE**  
TELEPHONE COOPERATIVE

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February 22, 2008

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, DC 20554

RE: **EB-06-TC-060**  
**EB Docket No. 06-36**  
**CERTIFICATION OF CPNI FILING**

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau, please find attached our company's annual compliance certificate for the most recent period as required by Section 64.2009(e) of the Commission's Rules together with a statement of our company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to the undersigned at 540.626.7111.

Sincerely,

  
Lisa W. Epperley  
General Manager

No. of Copies rec'd 0 + 1  
List ABCDE

PEMBROKE TELEPHONE COOPERATIVE  
P.O. Box 549  
Pembroke, VA 24136  
**Annual 47 C.F.R. § 64.2009(2) CPNI Certification**  
**EB Docket 06-36**

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Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 22, 2008

Name of Company covered by this certification: Pembroke Telephone Cooperative

Form 499 Filer ID: 809804

Name of signatory: Leon A. Law

Title of signatory: President

I, Leon A. Law, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et. seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.)

Signed



Leon A. Law, President

# **PEMBROKE TELEPHONE COOPERATIVE**

## **STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how Pembroke Telephone Cooperative (the Company) is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2001-2009).

### **1. Integrated Nature of CPNI Practices**

The Company is a family of affiliated companies providing telecommunications services. FCC rules require that the Company has separate affiliates for some services, but allows those separate affiliates to have common employees. Pembroke Telephone Cooperative is made up of the incumbent local exchange company, a long distance subsidiary and Internet group. Customers may not always be aware that different, individual affiliates of the Company provide them with specific telecommunications services. The Company's affiliates include the following companies:

Giles-Craig Communications, Inc

No matter which of the Company's affiliates provides a service, the employees of a single affiliate may provide customer service and support to the customers of the other affiliates. In other cases, employees may be dedicated to a single Company affiliate but still rely on operational support systems common to all of the Company's affiliates. Thus, the Company's practices for complying with the FCC's CPNI rules are on an integrated Company basis. References to "employees" in this document refer to employees of the Company as a whole.

### **2. CPNI Compliance Officer**

In addition to the specific matters required to be reviewed and approved by the Company's CPNI Compliance Officer, employees and agents are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the Company's CPNI Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

### **3. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI. These services are:

*Telecommunications Services:*

Local (ILEC)  
Interexchange (long distance)  
Commercial Mobile Radio Services (Wireless)

Non-telecommunications Services

Internet  
Voice Mail  
Inside Wiring  
CPE (Customer Premise Equipment)

**4. Use of CPNI Is Restricted**

The Company recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Company.

The Company has designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Company employees and agents who use or have access to CPNI; and (3) receiving, reviewing and resolving any questions or issues arising within the Company regarding use, disclosure, or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the Company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

**5. Permissible Uses of CPNI**

Company employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the Company, except as follows:

1. The Company may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer.
2. In the absence of an appropriate written request from the customer, the Company may provide the customer's phone records or other CPNI to a law enforcement agency only in response to a warrant or subpoena that specifies the particular CPNI to be furnished.

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3. The Company may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived. For example, the Company may use the CPNI from its provision of local exchange service to a customer to provide or market new, additional or modified local exchange service offerings to the customer. Likewise, the Company may use the CPNI from its provision of long distance toll service to a customer to provide or market new, additional or modified long distance toll service offerings to the customer.

4. The Company and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.

a. The FCC has noted the publishing of directories as an example of this permitted use.

b. The FCC has indicated that telecommunications carriers may use, disclose or permit access to CPNI, without customer approval, to provide inside wiring installation, maintenance, and repair services.

c. The FCC has stated that local exchange carriers and commercial mobile radio service providers may use CPNI, without customer approval, to market "adjunct-to-basic" services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

d. Any other use, disclosure or provision of CPNI under this "necessary to or used in the provision of" category must be expressly approved in writing by the Company's CPNI Compliance Officer.

5. The Company, its authorized employees and its billing agent may use CPNI to initiate, render, bill and collect for telecommunications services.

6. The Company may use CPNI to protect the Company's rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.

7. The Company may use, disclose, or permit access to CPNI derived from its provision of local exchange service or interexchange service, without the customer's approval, to provide customer premises equipment ("CPE"), call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

8. If a customer subscribes to more than one category of service offered by the Company, the Company is permitted to share CPNI among its affiliated entities that provide a service offering to the customer.

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If a customer does not subscribe to more than one offering by the Company, the Company is not permitted to share CPNI with its affiliates without the customer's consent pursuant to the notice and approval procedures set forth.

9. When an existing customer calls the Company to inquire about or order new, additional or modified services (in-bound marketing), the Company may use the customer's CPNI to assist the customer for the duration of the customer's call if the Company provides the customer with the oral notice guided by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules.

**6. Customer Notification and Authorization Process**

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008.

**7. Training**

The Company has trained existing employees having access to, or occasion to use CPNI, as to when they are and are not authorized to use CPNI. For new employees having access to, or occasion to use CPNI, the Company will include such training as part of employee orientation and training.

**8. Disciplinary Process**

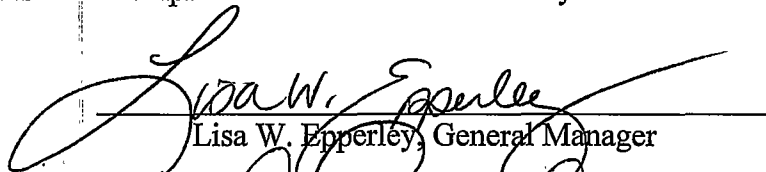
The Company has in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

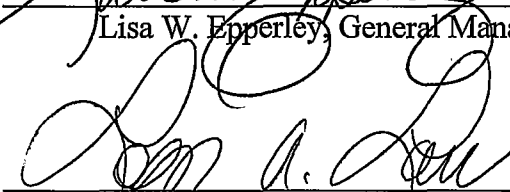
**9. Supervisory Review Process for Outbound Marketing**

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

02/22/08  
Date

2-22-08  
Date

  
Lisa W. Epperley, General Manager

  
Leon A. Law, President

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Please send the following **one Attachment** to:

**Best Copy and Printing Inc.,**  
445 12<sup>th</sup> Street, SW  
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Washington, DC 20554